

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  Walter F. Lynn Virginia D. Lynn  Debtor(s) <b>BAYVIEW LOAN SERVICING, LLC</b> Movant  vs. Walter F. Lynn Virginia D. Lynn  and <b>WILLIAM C. MILLER</b> Respondents	Chapter 13 Proceeding  15-11782-jkf  Hearing: 09/17/2015 at 9:30 am
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**OBJECTION TO CONFIRMATION OF THE PLAN**

BAYVIEW LOAN SERVICING, LLC (Movant), a secured creditor in this case objects to the plan and to the confirmation of the debtor's Chapter 13 plan and as grounds therefor would show the court the following:

1. The plan does not provide for the secured creditor, BAYVIEW LOAN SERVICING, LLC to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on March 17, 2015, Movant is the holder of a secured claim in the amount of \$678,808.56 secured by the Debtors' property located at 346 N. Warren Avenue, Malvern, PA 19355.
3. On or about July 21, 2015, Movant filed a Proof of Claim listing the arrears to be paid through the plan at **\$292,163.47**. See **Exhibit "A"** attached hereto and made a part hereof.
4. Debtor's Plan is silent on the amount of pre-petition arrears due to provide for Movant's arrearage claim. See **Exhibit "B"** attached hereto and made a part hereof.
5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Dated: July 23, 2015

Respectfully submitted,

/s/ Jill Manuel-Coughlin, Esquire

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